

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

DEC 04 2024

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

RYAN CRAIG STEVENS

Plaintiff,

v.

**MONTREAT COLLEGE;
DR. PAUL J. MAURER;
DR. DANIEL T. BENNETT;
DR. DOROTHEA K. SHUMAN; and
DR. RYAN T. ZWART,**

Defendants.

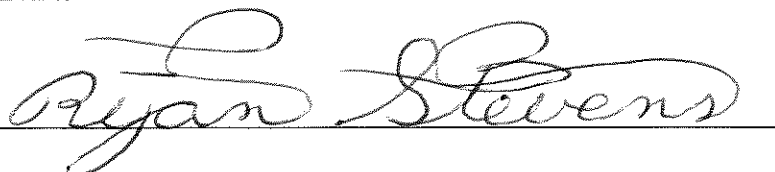
Case No. 1:24-cv-00225-MR-WCM

**PLAINTIFF'S MOTION FOR
ENTRY OF DEFAULT**

Pursuant to Rule 55(a) of the North Carolina Rules of Civil Procedure, and Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff Ryan Craig Stevens ("Plaintiff"), respectfully moves the Court for Entry of Default, as Defendants Montreat College ("Montreat College"), Dr. Paul J. Maurer ("Maurer"), Dr. Daniel T. Bennett ("Bennett"), Dr. Dorothea K. Shuman ("Shuman"), and Dr. Ryan T. Zwart ("Zwart") (collectively, "Defendants") failed to: 1) file and serve a responsive pleading to Plaintiff's Complaint – served upon Defendants' counsel on July 3, 2024 (acknowledged by Attorney Schaefer, on July 11, 2024), and additionally served on Defendants Montreat College, Maurer, and Bennett on July 9, 2024 – within the required 30-day response period, pursuant to Rule 12(a)(1) of the N.C. R. Civ. P., prior to removal; 2) properly serve a responsive pleading to the Complaint within the 7-day extended period, pursuant to Rule 81(c)(2)(C) and Rule 12(a)(1)(C) of the Fed. R. Civ. P., after removal, per the Court's Order "GRANT[ING]" Defendants' bad faith Motion for Extension of Time: "...the deadline for Defendants to file an answer or otherwise respond to Plaintiff's Complaint is EXTENDED through and including September 27, 2024" (Doc. 3); 3) file the Motion for Extension of Time, before expiration of each response period, prior to, and after, removal; and 4) show excusable neglect for failure to act, prior to, and after, removal, including Defendants' substantially untimely removal of the case.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests the Court enter an order granting Plaintiff's Motion for Entry of Default on all Defendants.

This the 4th Day of December, 2024.

By: 

Ryan Craig Stevens
23 Sleepy Hollow Lane
Swannanoa, NC 28778
(865) 469-1950
Ryan_Stevens316@icloud.com

Plaintiff in pro se

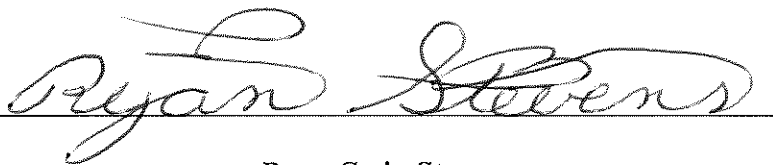
CERTIFICATE OF SERVICE

I, PLAINTIFF, hereby certify the foregoing **MOTION FOR ENTRY OF DEFAULT** was filed, this day, by delivering it to the clerk, and a copy executed, contemporaneously, to be served upon Defendants' counsel, via the United States mail (postage prepaid), addressed as follows:

Beth Tyner Jones, N.C. State Bar No. 15923
Jesse A. Schaefer, N.C. State Bar No. 44773
Womble Bond Dickinson (US) LLP
555 Fayetteville Street, Suite 1100
Raleigh, NC 27601
Telephone: (919) 755-8125
Facsimile: (919) 755-6752
Email: Jesse.Schaefer@WBD-US.com
Email: Beth.Jones@WBD-US.com

Counsel for Defendants, Montreat College, et al.

This the 4th Day of December, 2024.

By: 

Ryan Craig Stevens
23 Sleepy Hollow Lane
Swannanoa, NC 28778
(865) 469-1950
Ryan_Stevens316@icloud.com

Plaintiff in pro se